



RONALD
MURAWSKI/R5/USEPA/US
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To
Subject LATEST SSP COMMENTS LETTER

Gary, here's the latest letter. Regarding the pesticides sampling and analysis issue, Regional Counsel already talked to Blue Tee's outside Counsel in person about the importance of including this in the SSP. I'll mail the hard copies of the attached letter today.



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SR-6J

April 3, 2006

Mr. Gary D. Uphoff
Principal
Environmental Management Services Company
5934 Nicklaus Drive
Fort Collins, CO 80528

Subject: United States Environmental Protection Agency (U.S. EPA) Comments on the Entact March 2006 Revised Draft Support Sampling Plan, Revision 2; Old American Zinc Plant Site; Fairmont City, Illinois

Dear Mr. Uphoff:

After consulting with the U.S. EPA contractor CH2M Hill and the Illinois Environmental Protection Agency, I have included the subject comments in the enclosure.

Please revise the Support Sampling Plan as indicated in the enclosure; then, submit the revised document to me, along with a responses to comments letter, by April 17, 2006. For each response to comment, please cross-reference all parts of the Support Sampling Plan that have been changed.

Please contact me at 312-886-2940 if you want to discuss this letter.

Sincerely yours,

Ronald W. Murawski
Remedial Project Manager

Enclosure

cc: Tiffany Swoveland Chapman, CH2M Hill
Doyle Wilson, Illinois EPA
Pat Thomson, P.G., Entact

United States Environmental Protection Agency (U.S. EPA) Comments
on the Entact March 2006 Revised Draft Support Sampling Plan, Revision 2;
Old American Zinc Plant Site; Fairmont City, Illinois

1. Since the NCP requires a full characterization of the Site, the Support Sampling Plan (SSP) must include pesticides sampling and analysis. U.S. EPA will review the results of the pesticides analysis to determine if other entities such as General Chemical should be added as Respondents to the June 6, 2005 RI/FS AOC. As of now, the Respondents have not submitted "objective and validated findings" for U.S. EPA to determine whether Respondents should be added to the AOC. See Section XXIX, paragraph 101 of the AOC.

Please revise the SSP, including the Field Sampling Plan and Quality Assurance Project plan as needed, to include pesticides sampling and analysis. The revisions should include at least one figure showing pesticides sampling locations.

(See general response to comment 7 in the Entact March 21, 2006 responses to comments letter.)

2. In Section 4.3.1.1 of the SSP, add the groundwater exposure pathways for the future, on-site residential scenario. (See general response to comment 8 in the Entact March 21, 2006 responses to comments letter.) Also, modify the text to indicate that indoor air vapor intrusion and volatilization from groundwater use will be evaluated if chemicals with a volatile component (not just chemicals classified as VOCs) are detected in groundwater. Chemicals that are sufficiently volatile are presented in Table 1 of the U.S. EPA November 2002 "OSWER Draft Guidance for Evaluating the Vapor Intrusion to Indoor Air Pathway from Groundwater and Soils (Subsurface Vapor Intrusion Guidance)." (See general response to comment 8 and specific response to comment 18 in the Entact March 21, 2006 responses to comments letter.)
3. In Section 4.3.2 of the SSP, indicate that U.S. EPA's ProUCL method will be used to calculate upper confidence limits (UCL). (See general response to comment 9 in the Entact March 21, 2006 responses to comments letter.)
4. In the Lead Toxicity subsection of Section 4.3.4 of the SSP, add text to indicate that the U.S. EPA Adult Lead Methodology will be used in addition to the IEUBK model. (See general response to comment 9 in the Entact March 21, 2006 responses to comments letter.)
5. Please provide a revised Table 2 as indicated in specific response to comment 49. This table was missing from the latest submittals.
6. U.S. EPA has learned from EMS that XTRA Intermodal plans to demolish the on-site buildings. Should the demolition take place, the SSP may need to be revised to add sampling locations in and around the building footprints.